REMARKS

Applicant respectfully requests consideration of the subject application as amended herein. This Amendment is submitted in response to a Non-Final Office Action mailed on January 3, 2005. Claims 1-20 and 37-55 are rejected. Claims 21-36 have been withdrawn. In this amendment, claims 1, 3, 5, 7, 9, 11, 15 and 17 have been amended. No new matter has been added. Claims 2, 6, 10, 12, 13, 16, 18, 19 and 37-55 have been canceled without prejudice.

The Examiner objected to claims 11 and 17 for minor informalities. Claims 11 and 17 have been amended to remove the informalities.

Claim 13 and 19 are objected to under 37 C.F.R. 1.75(c), as being of improper dependent form for failing to further limit the subject matter of a previous claim. Claims 13 and 19 have been canceled. Hence, this objection is moot.

The Examiner rejected claims 1, 4-5 and 8 under 35 U.S.C. §103(a) as being unpatentable over Wang, et al. (U.S. Patent No. 5,903,673, hereinafter "Wang"), in view of Youn, et al., (U.S. Patent Application No. 2002/0154698, hereinafter "Youn"). Claims 2-3 and 6-7 are rejected under 35 U.S.C. §103(a) as being unpatentable over both Wang and Youn, and further in view of both Mann, et al., (U.S. Patent No. 6,330,281, hereinafter "Mann") and Sundqvist, et al., (U.S. Patent No. 6,549,669, hereinafter "Sundqvist"). Claims 9-11, 13, 15-17 and 19 are rejected under 35 U.S.C. §103(a) as being unpatentable over Mann, in view of Wang. Claims 12 and 18 are rejected under 35 U.S.C. §103(a) as being unpatentable over Mann and Wang, as applied in claims 9 and 15 above, and further in view of Sundqvist. Claims 14 and 20 are rejected under 35 U.S.C. §103(a) as being unpatentable over both Mann and Wang, as applied in claims 9 and 15 above, and further in view of Leppinen, (U.S. Patent No. 6,735,186, hereinafter "Leppinen"). Claims 44-46, 48-52 and 54-

55 are rejected under 35 U.S.C. §103(a) as being unpatentable over Mann, in view of Wang. Claims 47 and 53 are rejected under 35 U.S.C. §103(a) as being unpatentable over Mann and Wang as applied in claims 44 and 50 above, and further in view of Sundqvist. Claims 37 and 40-43 are rejected under 35 U.S.C. §103(a) as being unpatentable over Wang, in view of Youn. Claims 38 and 39 are rejected under 35 U.S.C. §103(a) as being unpatentable over both Wang and Youn, as applied in claim 37 above, and further in view of both Mann and Sundqvist. As discussed below, the pending claims are patentable over the above references.

Wang discloses a video signal encoder. The video signal encoder receives a current frame from a video source and stores the current frame in a current frame buffer. A motion estimator/compensator retrieves the current frame from the current frame buffer and a reconstructed previous frame from a pervious frame buffer and derives motion vectors that represent motion between the current and reconstructed previous frames. The motion estimator/compensator produces a current motion-compensated frame from the motion vectors and the current and reconstructed previous frames and passes the motion-compensated frame to a transform coder that performs direct cosine transformation (DCT) on the motion-compensated frame to produce a transformed frame and passes the transformed frame to a quantizer that quantizes coefficients used in the transform coder. These coefficients are then used for Huffman coding of the transformed frame to complete compression of the current frame. The result of the compression is either stored in the encoder or transmitted to a client computer hosting a video signal decoder. The video signal decoder receives an encoded motion video signal and reconstructs frames of a motion video image from the encoded motion video signal.

Thus, in Wang, the client receives encoded difference data from the encoder and reconstructs frames of a motion video image using the encoded difference data. The client in

Wang does not store the previous frames themselves and does not allow a user to request one of such previous frames from an external source. In addition, the encoder in Wang neither identifies a previous frame requested by a user of the client that stores a version of the previous frame nor requests this specific frame from the video source, as does the presently claimed invention.

In the presently claimed invention, in contrast, the client's user requests a network resource whose first version is stored in the client, and then the gateway identifies this network resource (e.g., using a URL contained in the client's request), requests this network resource from a server, compares a local copy of the first version of the network resource with its second version sent to the gateway from the server, and then sends difference data back to the client. Wang does not teach or suggest at least identifying a network resource, which is requested by a user of a client that stores a first version of this network resource, and requesting the network resource from a server, as claimed by the present invention. Furthermore, Wang does not teach or suggest performing the above operations by a gateway coupled to the server and the client.

The Examiner acknowledges that Wang does not explicitly disclose performing encoding operations in a gateway and cites Youn for such teaching, contending it would be obvious to combine Wang with Youn to produce the present invention (Office Action of January 3, 2001). Applicant respectfully disagrees.

Firstly, the references do not contain any suggestion that they be combined in the manner suggested by the Examiner. Youn discloses an environment that includes different networks interconnected by gateways that host transcoders. A transcoder receives an encoded video signal from an encoder via a first network, further compresses the encoded video signal and sends the resulting digital video output over a second network to a decoder.

The encoder providing encoded video signal to the transcoder operates similarly to an encoder described in Wang. Youn does not contain any suggestion that the encoder described in this reference or any similar encoder such as the one described in Wang would be added to the gateway. Moreover, one of ordinary skill in the art would have not been motivated to add an encoder of Wang to the gateway of Youn because Youn discloses an environment in which such an encoder is placed externally to a gateway and is connected to the gateway via a network.

Secondly, even if the above references were to be combined in the manner suggested by the Examiner, the combination would not meet the claims because Youn lacks the same features that are missing from Wang. Specifically, Youn does not teach or suggest at least identifying a network resource, which is requested by a user of a client that stores a first version of this network resource, and requesting the network resource from a server, as claimed by the present invention, as claimed in claims 1 and 5 of the present invention. These features are also missing from Sundqvist and Mann cited by the Examiner.

Thus, the present invention, as claimed in claims 1 and 5 and their corresponding dependent claims is patentable over the cited references.

With respect to claims 9 and 15, none of the above references teaches or suggests at least receiving a request for a network resource from a client that stores a current version of the network resource, the request including the identifier of the network resource, and getting a new version of the network resource from a content server using the identifier. Thus, the present invention, as claimed in claims 9 and 15 and their corresponding dependent claims is patentable over the cited references.

Applicant respectfully requests the withdrawal of the rejection under 35 U.S.C. § 103(a) and submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Marina Portnova at (408) 720-8300.

Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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